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May 30, 2024

## VIA ECF

The Honorable Dale E. Ho  
United States District Court  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: *John Doe v. Columbia University & Trustees of Columbia University*, No. 23-cv-10393-DEH (S.D.N.Y.) (“*Doe v. Columbia*”), and *John Doe v. Kachalia, et al.*, No. 23-cv-10395-DEH (S.D.N.Y.) (“*Doe v. Kachalia*”)

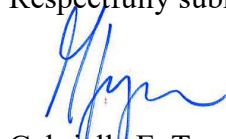
Dear Judge Ho:

We write on behalf of Defendant Trustees of Columbia University in the City of New York (“Columbia”) in the above-captioned actions to respectfully request that today’s filings—ECF 24 and 25—because they contain sensitive information, be temporarily de-linked from the public docket and that Columbia be permitted to respond to the filings, both substantively and with a proposal for any necessary sealing or redactions, by no later than Friday, June 14, 2024.

Although we have not yet had the opportunity to fully review Plaintiff’s filings from today, we can already see that the filings include sensitive information previously omitted from the public docket, including identifying by name a non-party who has otherwise been pseudonymous in this action, as well as in Plaintiff’s prior, virtually identical complaint. *See Doe v. Columbia Univ. & Trs. of Columbia Univ.*, No. 19-cv-11328-JPO, ECF 24. In addition, one of Plaintiff’s filings from today, ECF 24, includes details of a confidential agreement which, to date, have remained confidential pursuant to the agreement’s terms, *see, e.g.*, ECF 11 (moving to redact portions of a letter referring to a confidential term of the parties’ agreement).

Reserving all rights to raise any other defects with Plaintiff’s filings, *see, e.g.*, ECF 18 at 4 (limiting Plaintiff’s 16-page response to only four pages and staying all other deadlines), Columbia respectfully requests that the Court grant the relief requested in this letter motion and protect the above-referenced sensitive information, at least until this very issue of sealing and/or redaction may be fully submitted and addressed by the Court. *See, e.g.*, ECF 11 & 15.

Respectfully submitted,



Gabrielle E. Tenzer

**AFFIRMATION OF SERVICE**

I, Gabrielle E. Tenzer, declare under penalty of perjury that on May 30, 2024, I caused to be served a copy of this Letter via electronic and physical mail to the following addresses:

John Doe  
PO Box 209  
Buffalo, NY 14215  
jddoe591@gmail.com

Dated: May 30, 2024  
New York, New York

By:   
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